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August 6, 2002

Ex Parte

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W., TW-B204
Washington, D.C. 20554

Re: Application of Qwest Communications International, Inc.
To Provide In-Region InterLATA Services in the States of Colorado,
Idaho, Iowa, Nebraska and North Dakota, WC Docket No. 02-148

Application of Qwest Communications International, Inc.
To Provide In-Region InterLATA Services in the States of Montana,
Utah, Washington & Wyoming, WC Docket No. 02-189

Dear Ms. Dortch:

At the request of the staff of the Wireline Competition Bureau, the attached information has been provided in response to various loop-related questions.

QUESTION: For MR-8*, when will the June numbers be available?

ANSWER: MR-8* represents MR-8 with one additional exclusion -- namely, trouble tickets with "no trouble found" (or "NTF") that also had no additional troubles within 30 days where actual trouble was found. Because the measure waits an additional 30 days to determine if any trouble reports closed as NTF initially, have any actual troubles reported within 30 days of the NTF report, results are reported 30 days in arrears. Accordingly June results for MR-8* for CO DS1 unbundled loops will be published with the July report scheduled to be available on August 20, 2002. June results for MR-8* will remove trouble reports closed between June 1 - June 30 to NTF, that had no actual trouble reports reported between July 1 - July 31, from the numerator. Final results for trouble reports received between July 1 - July 31 are not available till the processing of July data is completed as part of the normal production of July performance results scheduled to be available on August 20, 2002.

QUESTION: Provide explanation for trouble rate for Colorado DS-1 loops in Colorado.

ANSWER: Qwest's performance around the provision of DS1 Capable Loops has been strong in each of the 5 application states over the last several months. Qwest's repair has generally been strong on every area as well, with the exception of MR-8 (the overall trouble rate). However, DS1 Capable loops are 1% or less of the overall loop volume in each of the 5 application states. In the FCC's PA 271 decision, Verizon was consistently missing several provisioning metrics around high capacity loops. Here Qwest is only missing one metric which, when given the volumes, should not be of overall concern. Nonetheless, Qwest is conducting a root cause analysis to see whether there is anything it can do to improve performance in this one area.

QUESTION: Confirm that starred performance results are provided for informational purposes.

ANSWER: The "starred" or "asterisked" PIDs consist of OP-5*, MR-7*, and MR-8*. Specifically, they represent what Liberty Consulting audited as OP-5, MR-7, and MR-8 and released as being accurate and reliable, with one additional exclusion -- namely, trouble tickets with "no trouble found" (or "NTF") that also had no additional troubles within 30 days where actual trouble was found. Thus, Liberty audited these three measurements with "NTF" tickets included, and Qwest also displays a version of these with "NTF" tickets excluded.

Qwest does report results for these three asterisk-type PIDs as additional information, but not "only" for that purpose. Where the asterisked results can help explain apparent disparities in the results displayed for the non-asterisked PIDs, Qwest includes this in the overall evidence it relies upon to demonstrate that it is satisfying checklist requirements -- in this case, to provide evidence that the apparent disparities are not due to discrimination.

The exclusion of "no trouble found" tickets from the results reported for PIDs that Liberty has audited consists of a clearly-defined, easily identifiable set of trouble tickets. This practice answers the appropriate question of, "what would the results look like if NTF tickets were excluded?" No party has come forth with evidence to challenge the assertions Qwest has made with this data.

Overall, this is done under Qwest's understanding that the FCC expects Qwest to provide additional evidence to explain, where possible, why results that appear to be disparate are, in fact, not due to discrimination. Thus, generally, where OP-5, MR-7, or MR-8 results appear to show disparity, Qwest will point to the asterisked results to show that there is evidence that the reason is not due to discrimination but, rather, due to the volume of "no trouble found" tickets.

QUESTION: Provide an explanation for the trouble rate for Nebraska and Iowa ISDN loops.

ANSWER: In Nebraska, Qwest provided parity service around this metric (MR-8) in 3 of the last four months. In IA, Qwest met the metric in one of the last 4 months; however, the 4 month average was a 2% trouble rate and the 4 months average for MR-8* was 1.4%. According to Verizon New York, para. 309, a trouble rate of 2% or less is acceptable performance.

QUESTION: Reconcile the statement in the Stewart Declaration that Qwest's performance disparity in M&R of line shared loops is due to the fact that "trouble reports on line shared loops are designated as service impacting and thus placed at a lower priority than out of service conditions for voice loops that have higher priority in the repair queue" with Michael Williams' testimony that "Qwest had changed its procedure to treat all line shared trouble reports as out of service reports."

ANSWER: Please see Karen Stewart's July 26, 2002 reply declaration, section "F. Line Sharing: Out of Service Reporting".

QUESTION: What was the implementation date of the multi-faceted program that included training, quality checks, and assigning a specific team to perform root cause analysis in relation to provisioning and repair performance.

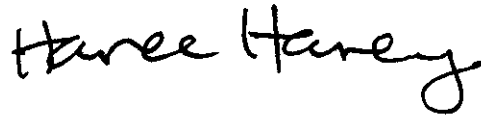
ANSWER: Over the course of the past year, Qwest has monitored provisioning and repair performance at the technician level in an effort to correct process adherence issues as they occur for all retail and wholesale products. On May 1, 2002, Qwest's QCCC began analyzing all unbundled loops, including DS1 Capable Loops, in an effort to identify root causes for repeat repairs and repairs for newly installed circuits that subsequently received a trouble report. Quality checks by supervision personnel and technician retraining are the primary methods for performance gap closure.

Beginning April 1, 2002, a dedicated PID management team under the supervision of Mr. Barry Orrel was formed for the specific purpose of determining, inter alia, why MR-8 for DS1 Capable Loops was outside of parity. This team focuses on systemic root cause analysis so it can recommend action plans on a 14 state basis. Examples of the methods employed by this team include statistical tools such as Pareto analysis and proportional inference as well as field observations. For example, this team recently performed a "ride-along" with a Colorado technician to observe process adherence associated with installation of DS1 Capable Loops.

Action plans are currently being implemented as a result of this team's ongoing analysis. The team will continue its focus on repair report rates for DS1 Capable Loops for the next 30 days. Therefore, Qwest expects this multi-faceted approach will lead to improved repair report rate performance for DS1 Capable Loops.

The twenty-page limit does not apply as set forth in DA 02-1390 and DA 02-1666.

Sincerely,

A handwritten signature in black ink that reads "Anne Haney". The signature is written in a cursive, flowing style.

cc: M. Carowitz
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